

Bryson, Santana and Joshua v. Rough Country, LLC

Page 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION

SANTANA BRYSON and JOSHUA BRYSON,)
as Administrators of the Estate)
of C.Z.B., and as surviving)
parents of C.Z.B., a deceased)
minor,)

Plaintiffs,

vs.

ROUGH COUNTRY, LLC,

Defendant.

) No.
) 2:22-cv-17-RWS
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)
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)

VIDEOTAPED DEPOSITION OF CHARLES CROSBY, P.E.
Phoenix, Arizona
May 14, 2024
9:00 a.m.

REPORTED BY:

Robin L. B. Osterode, CSR, RPR
CA Certified Shorthand Reporter No. 7750
AZ Certified Reporter No. 50695

1 THE WITNESS: Yes.

2 BY MS. CANNELLA:

3 Q. It's run thousands of crash tests with
4 crash test dummies in them.

5 Do you agree with that?

6 A. Yes.

7 Q. Does Exponent own crash test dummies or
8 ATDs, as they're called, or does it rent them?

9 A. We own -- we own some of them and we rent
10 some of them, depending on the project.

11 Q. Does Exponent own child dummies?

12 A. We do.

13 Q. Does Exponent own 5 percent female dummies?

14 A. We do.

15 Q. Have you run -- personally run crash tests
16 with dummies in them?

17 A. I have.

18 Q. Have you run crash tests with instrumented
19 dummies in them?

20 A. Yes.

21 Q. In the cars? Okay.

22 And what do you do if the dummy is a number
23 of fewer pounds than the person in the crash?

24 A. Depending on the parameters requested, we
25 can either lighten the dummy up or we can add ballast

1 weight and make the dummy heavier.

2 Q. And did anyone ask you to put dummies in
3 the Escape for the crash test you did in this case?

4 A. They did not.

5 MS. CANNELLA: Can you let Devin in the
6 wait -- or out of the waiting room.

7 THE VIDEOGRAPHER: Oh, is he in there?

8 MS. CANNELLA: Yeah.

9 THE VIDEOGRAPHER: Can we go off the record
10 for a moment? I don't know. I don't have it on my
11 side. Let me see.

12 MS. CANNELLA: Okay.

13 THE VIDEOGRAPHER: I didn't see it in
14 there. I don't have it on my computer. She's got
15 it. Let's go off the record, if that's okay.

16 MS. CANNELLA: Yeah, that's fine.

17 THE VIDEOGRAPHER: Okay. We're going off
18 the record. The time is 9:49.

19 (Recessed from 9:49 a.m. until 9:52 a.m.)

20 THE VIDEOGRAPHER: We're back on the
21 record. The time is 9:52.

22 BY MS. CANNELLA:

23 Q. Okay. Mr. Crosby, Wesley Grimes and
24 Dr. Lisa Gwin have both testified in this case. Are
25 you going to refute anything that they are going to

1 STATE OF ARIZONA)
COUNTY OF MARICOPA)

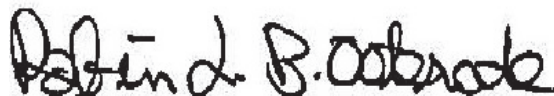
3 CERTIFICATE

4 I, ROBIN L. B. OSTERODE, Certified Shorthand
5 Reporter for the State of California and Certified
6 Reporter for the State of Arizona certify:

7 That the foregoing proceeding was taken by
8 me; that I am authorized to administer an oath; that
9 any witness, before testifying, was duly sworn to
10 testify to the whole truth; that the questions and
11 answers were taken down by me in shorthand and
12 thereafter reduced to print by computer-aided
13 transcription under my direction; that review and
14 signature was requested; that the foregoing pages are
15 a full, true, and accurate transcript of all
16 proceedings, to the best of my skill and ability.

17 I FURTHER CERTIFY that I am in no way
18 related to nor employed by any of the parties hereto,
19 nor am I in any way interested in the outcome hereof.

20 DATED this 28th day of May, 2024.

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23 

24 ROBIN L. B. OSTERODE, CSR, RPR

CA CSR No. 7750

25 AZ CR No. 50695